



December 1, 2004

Jim Christiansen  
EPA Region VIII  
999 18<sup>th</sup> St., Suite 300  
Denver, CO 80202

2004 DEC - 6 PM 2:37  
EPA REGION VIII  
SUPERFUND BRANCH

RE: Libby Railyard Biotite Removal, Libby, Montana  
EMR Project No. 5539.004  
November 12, 2004 Weekly Progress Report

Dear Mr. Christiansen,

EMR, Inc. (EMR), on behalf of the Burlington Northern and Santa Fe Railway Company (BNSF), is providing this correspondence to summarize data which has been previously overlooked for the Libby Railyard, Montana, Libby Asbestos Site, Libby, Montana. In the course of reviewing the site's historical data some laboratory data was again reviewed to assure compliance with the work plan and prove completion of the project. It was discovered that three composite soil samples that were collected in October and November of 2001 exhibited impacts of less than one percent (<1%) actinolite. Upon farther review it was determined that these impacts had been identified in 2002 and a facsimile was sent to Mark Rainey of the Volpe Center on January 25, 2002 with the soil sampling log sheets associated with those three samples. A copy of that facsimile cover sheet is included as an attachment.

At a later date EMSL did analyze the discreet samples associated with the three composite samples which exhibited impacts. The three samples with impacts were BN-09000, BN-19000, and BN-20000. Volpe supplied EMR with an electronic copy of the analytical data for the discreet samples in November 2004. The attached Table includes the laboratory data for the composite samples and the discreet samples from that sampling event. Sample BN-09000 had detections of actinolite at a concentration of <1% in 4 of the 5 discreet samples; samples BN-19000 and BN-20000 each had a detection of <1% actinolite in 1 of the 5 discreet samples. EMR compared the sample results for these 6 impacts detected in the discreet samples with the 2004 work plan.

Upon review of this data it was determined that two areas which remain in place potentially contain impacts; these two areas are located south of the main line on the site. The discreet samples associated with those areas have been highlighted in boldface print in the table.

The first area is the southern half of grid 9 (samples BN-09003 and BN-09004) located on the west side of the site (Figure 2). The center sample closest to the main line (BN-09001) did not contain detectable Libby Amphibole (LA), and the two northern sample

locations (BN-09002 and BN-09005) are located in areas excavated in 2004. The first area in grid 9 is approximately 50 feet by 100 feet.

The second area is located within grid 20 (Figure 1); this grid contained one discreet sample (BN-20004) with impacts located in the southeast quadrant. This area is approximately 50 feet by 50 feet.

The impact detected in grid 19 was from a sample collected north of the main line (BN-19003) in an area which was also excavated in 2004.

If you have any questions or require further explanation concerning the above information, please call Tanya Drake of EMR at (763) 277-5200, Chuck Soule of Kennedy/Jenks Consultants at (253) 874-0555, or David Smith of BNSF at (406) 447-2307.

Sincerely,  
EMR, Inc.



Tanya Drake  
Project Coordinator

cc: Mr. David Smith, BNSF Manager Environmental Remediation, Helena, Montana  
Mr. Dave Diem, Kennedy/Jenks Consultants, Irvine, California  
Mr. Chuck Soule, Kennedy/Jenks Consultants, Federal Way, Washington  
Ms. Courtney Zamora, Volpe Federal Programs, Libby, Montana  
Mr. Dan McCaskill, BNSF Industrial Hygiene, Ft. Worth, Texas

## FIGURES

# Color Chart(s)

The following pages  
contain color that does  
not appear in the  
scanned images.

To view the actual images, please  
contact the Superfund Records  
Center at (303) 312-6473.

**LEGEND:**

- FENCE
- ===== RAILROAD TRACKS WITH ASSIGNED NUMBER
- ===== MAIN LINE RAILROAD TRACKS  
(3-4" DIAMETER QUARTZITE BALLAST AT LEAST 1-FOOT DEEP)
- ===== PARKED TRAIN AT TIME OF INSPECTION
- VISIBLE BIOTITE MARKED WITH RED SURVEYOR'S WHISKER
- NW

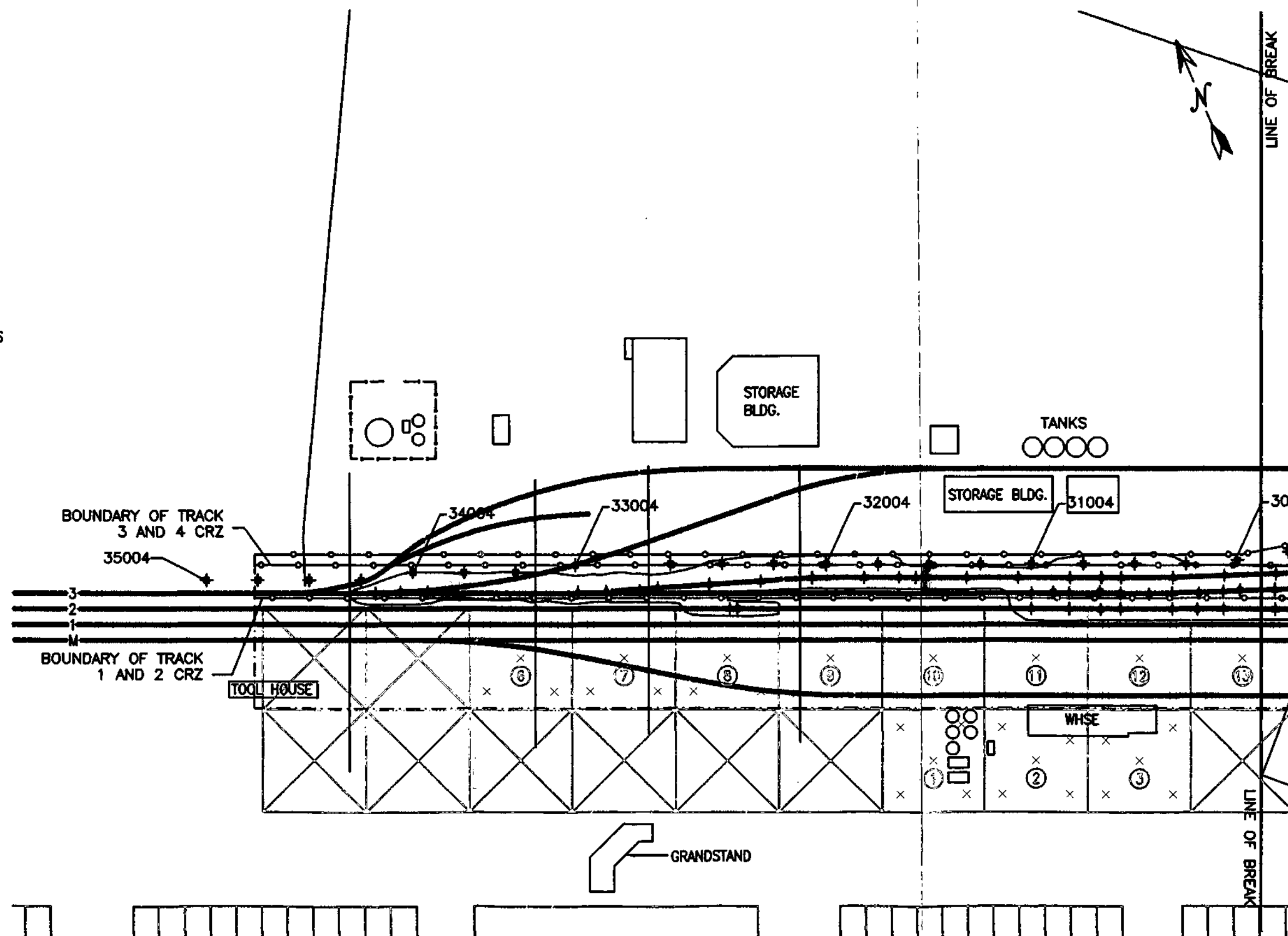
NE

C

SW

SE

 SAMPLING GRID (100'x100')  
 WITH GRID NUMBER AND GEOGRAPHIC  
 REGIONS CORRESPONDING TO SAMPLE ID'S  
 (EX. 2-C, 2-NW, 2-NE, 2-SW, 2-SE)
- GRID LOCATION REMOVED
- ◆ POST VACUUM REMOVAL SOIL SAMPLE  
 (50 FT INTERVAL)
- ◆ SITE INVESTIGATION SAMPLES
- ◆ DISPOSAL CRITERIA SAMPLE



WEST AREA  
FIELD SAMPLING PLAN/  
MAP OF VISIBLE BIOTITE  
BNSF RAIL YARD  
LIBBY, MT.

0 100  
APPROXIMATE SCALE IN FEET

BNSF RAILWAY STATION MAP  
LIBBY, MT.

Drawn by : SES  
Checked By : G.M.C.  
Project No. : 5538.002-1  
File Name : 5538002-REV3.DWG  
Revision No. : 3  
Date : 11/18/02  
Scale : 1"=100'-0"

FIGURE  
2

LINE OF BREAK

HIGHWAY BRIL

RIVER

LEGEND:

- FENCE
- 1 RAILROAD TRACKS WITH ASSIGNED NUMBER
- M MAIN LINE RAILROAD TRACKS (3-4" DIAMETER QUARTZITE BALLAST AT LEAST 1-FOOT DEEP)
- █ PARKED TRAIN AT TIME OF INSPECTION

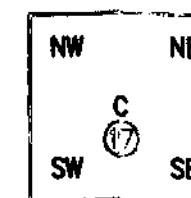
VISIBLE BIOTITE MARKED WITH RED SURVEYOR'S WHISKER

ED EQUIPMENT DECONTAMINATION

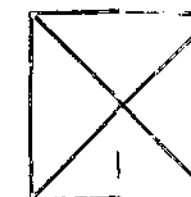
DT DECONTAMINATION TRAILER

Ⓟ POWER HOOKUP

Ⓢ WATER HOOKUP



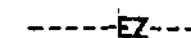
SAMPLING GRID (100'x100') WITH GRID NUMBER AND GEOGRAPHIC REGIONS CORRESPONDING TO SAMPLE ID'S (EX. 2-C, 2-NW, 2-NE, 2-SW, 2-SE)



GRID LOCATION EVALUATED



CONTAINMENT REDUCTION ZONE (CRZ)



EXCLUSION ZONE



PROJECT SITE (LEVEL D PPE REQUIRED)

◆ POST VACUUM REMOVAL SOIL SAMPLE (50 FT INTERVAL)

◆ SITE INVESTIGATION SAMPLES

◆ DISPOSAL CRITERIA SAMPLE

PROJECT SITE ENDS AT NORTH CRZ LINE

END OF TRACK #5

SOIL TRANSFER & CONTAINER STAGING AREA

PROJECT SITE ENDS AT NORTH CRZ LINE

END CRZ

30004

29004

28004

ACCESS ROAD

27004

26004

25004

24004

23004

ASPHALT

ASPHALT

PLATFORM

DEPOT

ASPHALT

ASPHALT

ASPHALT

WHSE

WHSE BLDG

GAR

WHSE

NOTE:

CLEANUP WILL PROCEED ON TRACKS 1 AND 2 FIRST MOVING EAST TO WEST AND THEN ON TRACKS 3 AND 4 MOVING EAST TO WEST. CRZ BOUNDARY WILL MOVE FROM BETWEEN TRACKS 2 AND 3 TO NORTH OF TRACK 4. EZ BOUNDARIES SHOWN ON MAP PORTRAY TWO EXAMPLE OVERLAPPING EZ BOUNDARIES. ADDITIONAL EZ BOUNDARIES WILL BE CONSTRUCTED IN SIMILAR FASHION TO WEST IN THE SAME CLEANUP PATH DESCRIBED ABOVE.



EAST AREA  
FIELD SAMPLING PLAN/  
MAP OF VISIBLE BIOTITE  
BNSF RAIL YARD  
LIBBY, MT.

0 100  
APPROXIMATE SCALE IN FEET

BNSF RAILWAY STATION MAP  
LIBBY, MT.

Drawn by : SES  
Checked By : G.M.C.  
Project No. : 5539.002-1  
File Name : 5539002-REV3.DWG  
Revision No. : 3  
Date : 11/18/02  
Scale : 1"=100'-0"

FIGURE  
1

## TABLE

5309

Facsimile  
TRANSMITTAL

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**Name:** Mr. Mark Rainey  
**Organization:** Volpe Center  
**Fax:** [617-494-2789]  
**From:** Dave Welch, EMR, (425) 861- 4561, ext. 13  
**Date:** 1-25-02  
**Subject:** Libby, MT Soil Sampling-BNSF Railyard  
**Pages:** 21 (including cover)

Mark,

Per your request, here are sampling logs and maps which show location of the composite soil samples (9, 19 and 20) which contained detectable concentrations of actinolite asbestos in the BNSF Railyard in Libby, MT.

11" x 17" size maps will go out to you in the mail today.

From the desk of :  
David L. Welch, Project Geologist  
Environmental Management Resources, Inc.  
2509 152<sup>nd</sup> Avenue NE, Suite E  
Redmond, WA 98052  
425-861-4561, ext. 13  
fax 425-869-7820  
e-mail: welch@emr-inc.com



**Table 1: 2001 Soil Sample Analytical Results**

<b>Sample ID</b>	<b>Matrix</b>	<b>Date</b>	<b>Method</b>	<b>Tremolite-Actinolite (%)</b>	<b>Sample Location</b>
BN-01000	Surface soil	10/31/2001	PLM-9002	ND	Composite
BN-02000	Surface soil	10/31/2001	PLM-9002	ND	Composite
BN-03000	Surface soil	10/31/2001	PLM-9002	ND	Composite
BN-04000	Surface soil	10/31/2001	PLM-9002	ND	Composite
BN-05000	Surface soil	10/31/2001	PLM-9002	ND	Composite
BN-06000	Surface soil	10/31/2001	PLM-9002	ND	Composite
BN-07000	Surface soil	10/31/2001	PLM-9002	ND	Composite
BN-08000	Surface soil	10/31/2001	PLM-9002	ND	Composite
BN-09000	Surface soil	10/31/2001	PLM-9002	< 1	Composite
BN-09001	Surface soil	10/31/2001	PLM-9002	ND	Grid-9 Center
BN-09002	Surface soil	10/31/2001	PLM-9002	< 1	Grid-9 NW
<b>BN-09003</b>	<b>Surface soil</b>	<b>10/31/2001</b>	<b>PLM-9002</b>	<b>&lt; 1</b>	<b>Grid-9 SE</b>
<b>BN-09004</b>	<b>Surface soil</b>	<b>10/31/2001</b>	<b>PLM-9002</b>	<b>&lt; 1</b>	<b>Grid-9 SW</b>
BN-09005	Surface soil	10/31/2001	PLM-9002	< 1	Grid-9 NE
BN-10000	Surface soil	10/31/2001	PLM-9002	ND	Composite
BN-11000	Surface soil	10/31/2001	PLM-9002	ND	Composite
BN-12000	Surface soil	10/31/2001	PLM-9002	ND	Composite
BN-13000	Surface soil	11/1/2001	PLM-9002	ND	Composite
BN-14000	Surface soil	11/1/2001	PLM-9002	ND	Composite
BN-15000	Surface soil	11/1/2001	PLM-9002	ND	Composite
BN-16000	Surface soil	10/31/2001	PLM-9002	ND	Composite
BN-17000	Surface soil	11/1/2001	PLM-9002	ND	Composite
BN-18000	Surface soil	11/1/2001	PLM-9002	ND	Composite
BN-19000	Surface soil	11/1/2001	PLM-9002	< 1	Composite
BN-19001	Surface soil	11/1/2001	PLM-9002	ND	Grid-19 Center
BN-19002	Surface soil	11/1/2001	PLM-9002	ND	Grid-19 NW
BN-19003	Surface soil	11/1/2001	PLM-9002	< 1	Grid-19 NE
BN-19004	Surface soil	11/1/2001	PLM-9002	ND	Grid-19 SE
BN-19005	Surface soil	11/1/2001	PLM-9002	ND	Grid-19 SW
BN-20000	Surface soil	11/1/2001	PLM-9002	< 1	Composite
BN-20001	Surface soil	11/1/2001	PLM-9002	ND	Grid-20 Center
BN-20002	Surface soil	11/1/2001	PLM-9002	ND	Grid-20 NW
BN-20003	Surface soil	11/1/2001	PLM-9002	ND	Grid-20 NE
<b>BN-20004</b>	<b>Surface soil</b>	<b>11/1/2001</b>	<b>PLM-9002</b>	<b>&lt; 1</b>	<b>Grid-20 SE</b>
BN-20005	Surface soil	11/1/2001	PLM-9002	ND	Grid-20 SW
BN-21000	Surface soil	11/1/2001	PLM-9002	ND	Composite
BN-22000	Surface soil	11/1/2001	PLM-9002	ND	Composite

## ATTACHMENTS